SUMMARY OF REMEDIAL ALTERNATIVE SELECTION
LASALLE ELECTRICAL UTILITIES
LASALLE, ILLINOIS
March 29, 1988

I. SITE NAME, LOCATION, AND DESCRIPTION

The LaSalle Electrical Utilities (LEU) National Priorities List (NPL) site is located in west-central LaSalle County, in the city of LaSalle in north-central Illinois (SE 1/4, SW 1/4 of Section 3, T33N, R1E). The 1980 census data showed the City of LaSalle to have a population of 10,347 (Figure 1).

The LEU property (located at 2427 St. Vincent Avenue) has remained essentially undisturbed since the plant was closed in 1981. Five buildings, interconnected to form one main complex, remain on the property. This complex includes an office building, two metal buildings, a brick building, and a Quonset building. Other small buildings remaining on the property include a pump house, two small hose houses, a thinner shed, and a sandblasting shed. West of the Quonset building is a small storm water holding pond which receives precipitation run-off from an asphalt lot south of the property. Also west of the Quonset building is a small fenced area that formerly contained a small incinerator. At present, a chain-link fence surrounds approximately one half of the property. The remainder of the property consists of a large open field (Figure 2).

The bedrock in the area consists primarily of shale, sandstone, dolomite, and limestone. The upper bedrock is a highly weathered shale found at a depth of approximately 20 to 25 feet. Overlying the bedrock is approximately 10 feet of glacial till. Over the till is an interbedded unit of sand, silt, and clay.

There are four major hydrogeologic aquifers which occur in this area of Illinois. The Mt. Simon-Elmhurst aquifer, the deepest of the four, is not utilized in the LaSalle area due to its extreme depth and its high mineral content. The next aquifer is the Ironton-Galesville which serves the three public water supply wells in the nearby community of Peru, Illinois. The shallow dolomite, and the sand and gravel aquifers in the area serve many domestic and public wells.

Approximately 70 residences are located within 1/8 mile of the LEU property. Based on the 1980 census data showing approximately 2.7 individuals per household in the area, it is estimated that these residences house about 190 people. The land use to the north of the property is rural with an agricultural field separating the facility from a residential development. Immediately south of the site are several commercial developments, including a furniture store, a gasoline/fuel oil distributor, and a restaurant. East of the facility is the residential area that was previously addressed, while a mixture of small businesses and residences lie to the west.

II. SITE HISTORY AND ENFORCEMENT ACTIVITIES

LEU is a former manufacturer of electrical equipment. Operations at the plant began prior to World War II, and in the late 1940s the plant began utilizing polychlorinated biphenyls (PCBs) in the production of capacitors. This manufacturing practice continued until October 1978. During the 1970s, the company expanded its operations and opened another plant in Farmville, North Carolina. In May 1981, manufacturing operations ceased at the LaSalle plant. Subsequently, the Illinois Environmental Protection Agency (IEPA), enforcing Section 34 of the Illinois Environmental Protection Act, ordered the production areas of the plant to be sealed. The LEU office building remained in use by a lessee until some time in the early 1980s. Since that time, the entire facility has been abandoned.

Information is limited on the waste management practices of the company. Undocumented reports allege that PCB-contaminated waste oils may have been applied as a dust suppressant both on and off the property as late as 1969. Following the regulation of PCBs, inventory reports document the disposal of PCBs at approved facilities.

Beginning in September 1975, numerous government agencies including the United States Environmental Protection Agency (U.S. EPA), the IEPA, and the Occupational Safety and Health Administration (OSHA) conducted various inspections and issued numerous complaints and orders to the LEU company as a result of its past and present manufacturing and handling practices. Since 1981, when the LEU facility ceased operations, the actions of the IEPA and the U.S. EPA have been aimed at determining the nature and extent of contamination at the site and determining the appropriate remedies for that contamination. A chronological listing of all major actions at the site since 1975 is contained in a table at the end of this summary (Attachment I).

Analysis of site records revealed only one Potentially Responsible Party, LEU, from which the U.S. EPA could seek reimbursement of costs associated with the investigation and removal of contamination at this site. LEU, however, is not financially viable.

On September 19, 1983, now operating exclusively in North Carolina, the LEU petitioned for relief under Chapter 11 of the Bankruptcy Act in the U.S. Bankruptcy Court, Wilson, North Carolina. On June 26, 1986, the court entered an order approving the company's planned liquidation.

LEU was sold by order of the Bankruptcy Court on January 20, 1984, to Heede Industries for $800,000. The sale did not include the LaSalle plant or property. All proceeds from the sale went to the Lake Shore National Bank in Chicago which had a valid security interest in all of LEU's assets in the amount of approximately $1,908,000.

Previously, the Lake Shore National Bank not only found the purchaser for the LEU Farmville, North Carolina facility, but it also financed the purchase by advancing the purchase price of $800,000 in return for two promissory notes from Heede Industries in the amount of $400,000 each. Lake Shore National Bank also retained its security interest in the LEU accounts receivable to the date of sale, and in the LaSalle, Illinois property.

The U.S. EPA and the State of Illinois both filed claims in the bankruptcy action for past and future costs associated with their removal and remedial actions at the site. There was no money in the estate, however, to pay these costs. The only asset which could be applied toward these costs is the LaSalle, Illinois property itself. (Presumably, after cleanup, the LaSalle property will have a positive cash value.)

The amended plan approved by the Bankruptcy Court on June 26, 1986, provided that the LaSalle, Illinois property first would be offered to secured lien holders (Lake Shore National Bank, Realtor Developers, and Equity Research). If the secured lien holders refused to accept title, their claims would become unsecured claims, and LEU would retain title to the property. According to the amended plan, the U.S. EPA and the State of Illinois would then be given liens on the property for the costs of their cleanup work at the site (a lien to the U.S. EPA for 90% of the costs, and a lien to the State of Illinois for 10% of the costs).

III. COMMUNITY RELATIONS

The Superfund activities at the LaSalle site have been followed closely and consistently by the local press. Interest in the activities at the site has been high because the residential area is directly affected by the work outlined in the original (August 29, 1986) Record Of Decision (ROD). Local and State elected officials, as well as the local news media representatives, have maintained a constant and serious interest in the activities at the site.

On January 18, 1988, draft copies of the FS and the U.S. EPA's Proposed Plan (Attachment II) for Remedial Action were made available to the residents and other interested parties for their review and comment. A press release by the IEPA announced the availability of the reports, the locations in the community where they were available for viewing, the dates of the official public comment period (January 18 to February 19, 1988), and the February 17, 1988 public meeting.

The IEPA has conducted a thorough and comprehensive community relations program in the area. The program included regular distribution of fact sheets, public meetings (both large formal ones and small informal ones), and dialogue with area residents and officials.

On February 17, 1988, a public meeting was held at a nearby motel. The purpose of the meeting was to present the results of the FS and the proposed remedial alternatives. In addition, both oral and written comments and questions pertaining to this remediation were solicited.

At the hearing, both the local and state officials expressed their support for the proposed alternatives. While the citizens at the meeting generally supported the alternatives, they did express the following concerns:

1. The local residents stated that they would like to see the site restored to usuable commercial property capable of supplying employment to the local residents.

2. Residents expressed a stated desire to amend or modify the existing cleanup contract (for work in the residential area as outlined in the 1986 ROD) to include this cleanup of the LEU property. They felt that this type of change would allow site work to be completed in a more timely manner.

   The Remedial Action (RA) being initiated under this ROD is not an amendment or continuation of the current RA presently being undertaken in accordance with the 1986 ROD, but is a separate RA start. Federal procurement regulations outline the required method of procuring construction services during a Superfund RA. The regulations clearly state that formal advertising (40 CFR 33.405 - 33.430) is to be used. The regulations further state that noncompetitive negotiation (40 CFR 33.605) can only be used when other procurement methods are inappropriate because:

   a. the item is only available from one source;
   b. a public emergency exists;
   c. competition, after solicitation, is inadequate; or
   d. the U.S. EPA Award Official authorizes noncompetitive negotiation, subject to the limitations of 40 CFR 33.715(a)(2).

   Formal advertising cannot be waived in the Superfund remedial program on the basis of a claimed emergency situation since the U.S. EPA handles such emergencies under the removal program. In addition, a declaration of an emergency under State law does not necessarily constitute an emergency under U.S.EPA's Superfund criteria. Formal advertising in accordance with Federal regulations, should take, from beginning to end, approximately four months. This process can begin as soon as adequate criteria are available during Remedial Design to prepare a procurement package. Finally, based on the results of the competetive procurement for the RA outlined in the 1986 ROD, there is no reason to believe that competition will be inadequate.

The Responsiveness Summary to the formal public comments which were received is attached to this summary (Attachment III).

IV. SCOPE AND ROLE OF OPERABLE UNIT OR RESPONSE ACTION

In March 1986, after review of the Draft Remedial Investigation (RI) report, the U.S. EPA elected to split the site into two separate projects. The RI had adequately characterized the soil contamination in the area. However, it had failed to sufficiently determine the extent of ground water contamination which was emanating from the LEU property. The first half of the project dealt with soil contamination not on the LEU property, while the second half of the project (this decision) addresses all remaining contamination.

V. SITE CHARACTERISTICS

Soil and Sediment

The primary contaminants of concern in the soil on the LEU property are PCBs. Other materials, primarily volatile organic compounds (VOCs), were detected above normal background levels in this area, but these were only found in a localized area west of the manufacturing facility. During the site work for the Supplemental Remedial Investigation (RI), field screening of the soil borings from this area (directly west of the LEU plant) indicated the presence of high levels of VOCs. However, no samples from this area were sent to a laboratory for detailed organic analysis because the nature of the contaminants had already been identified by analysis of water samples from the monitoring well located at that location (G105).

Concentrations of PCBs in the composite soil samples on the property range from as low as 0.38 parts per million (ppm) to as high as 17,000 ppm, but typically average over 1,200 ppm in the first foot of soil. Depths of contamination range from 1 to 2 feet in most areas, to as much as 5 feet in a localized area directly adjacent to the west side of the facility. Based on the cleanup levels selected in the 1986 ROD for the residential soil contamination at this site (5 ppm to a depth of 1 foot and 10 ppm at depths greater than 1 foot), the total volume of soil that is contaminated on the LEU property is estimated to be 23,500 cubic yards (cy). This number assumes that 3 feet of soil, or approximately 7,800 cy, beneath the plant buildings is also contaminated and must be addressed during the final remediation.

The sewer system investigation focused on storm and sanitary sewers originating on the LEU property and the unnamed creek nearby which is the point of discharge for one of the storm sewers. Sediment samples throughout the sewer system were found to contain PCB concentrations between 28 and 5700 ppm. Sediment samples from the unnamed creek contained PCB contamination with concentrations averaging 18 ppm in the first 200 feet after discharge and only 1.7 ppm at a point 1000 feet downstream. This creek empties into the Little Vermilion River about 3,500 feet downstream, and the Little Vermilion empties into the Illinois River approximately 2 miles downstream (Figure 3). Approximately 100 cy of sediment in the creek are contaminated and will be addressed along with the LEU soil.

A detailed presentation of the soil and sediment contamination is presented in the RI report which was prepared by IEPA. Additional information related to the recent soil boring and field screening activities is contained in the Supplemental RI Report.

Ground Water

Monitoring wells at the site were sampled and analyzed for both PCBs and VOCs. PCB contamination over 10,000 parts per billion (ppb) was detected in ground water directly west of the LEU buildings, but the average PCB concentration in the ground water is approximately 100 ppb. A total of 12 different VOCs were detected in various wells at the site. Like PCBs, the highest levels were found directly west of the LEU building in a well placed where heavy VOC contamination was found in the soil (monitoring well G105). An oil layer was found above the ground water in this well, but was believed to result from a denser oil in the heavily contaminated soil settling and collecting in the well hole.

The primary VOCs identified during the RI were: 1) trichloroethylene; 2) trans-1,2-dichloroethylene; 3) 1,1,1 trichloroethane; 4) 1,1 dichloroethane; 5) vinyl chloride; 6) 1,1 dichloroethylene; 7) toluene; 8) tetrachloroethylene; 9) ethylbenzene; and 10) xylene. (A complete list of the contaminants identified at the site is contained in Table 2-1 of the Supplemental RI Report.) Contour maps of trichloroethylene and trans-1,2 dichloroethylene ground water contamination show results similar to the PCB results. The highest concentrations of these contaminants are found directly west of the LEU buildings, and the average concentrations on the property are approximately 100 ppb. The contaminant plumes are moving off the LEU property in an east and southeast direction (Figures 4 to 6). A detailed discussion of the ground water investigation and contamination can be found in the Supplemental RI Report.

Structures

The structures on-site that were not addressed in the previous ROD are limited solely to the LEU property (Figure 2). The investigation of these structures revealed PCBs in dust samples, wipe samples, and samples of construction material (dry wall and roofing material). Significant concentrations (greater than 150 ug/100 cm^2) were identified in all surface samples collected. Contamination of the structures due to VOCs was not investigated. An investigation to determine the presence of VOCs was not a necessary step in the analysis of remedial measures, given the presence of PCBs. This is because structural remediation selected to address the PCBs would deal with the VOCs present as well.

VI. SUMMARY OF SITE RISKS

PCBs are a family of compounds containing partially or wholly chlorinated isomers of the biphenyl molecule. Commercial mixtures generally contained 40-60 percent chlorine with over 200 possible isomers, although only about 10 of these isomers were ever distributed in the U.S. using an aroclor designation for identification. The PCB mixtures are thermally stable, have low solubility in water, low vapor pressure, high boiling point, and a high dielectric constant. PCBs adsorb strongly to soils, especially those with high organic content.

The specific PCB aroclors found at the site have water solubilities of 54 ug/l for aroclor 1248 and 12 ug/l for aroclor 1254. The PCB contamination idenfified in the ground water at the site is believed to be proportional to the concentration of dissolved and suspended solids found in the water. The concentrations of PCBs in the ground water are expected to be minimized by excavation of the contaminated soil. The natural affinity of the PCBs to soil limits the amount of surface migration from the site. Therefore, the only significant migration that is likely to occur would be the result of tracking and/or blowing of the contaminated soil from one location to another.

VOCs, as a group, are generally soluble in water, readily transported, and easily treated. A discussion of the properties of each of the specific VOCs found at the site is contained in Section 5.4.3 of the Supplemental RI report. An in-depth evaluation of the extent to which the release of these contaminants may endanger human health and the environment was prepared by an IEPA contractor and is contained in Appendix D to the Feasibility Study (FS).

PCBs are considered to have slight acute toxicity, but are resistant to natural biological degradation. The toxicological properties of PCBs appear to vary widely according to various parameters, but they have been identified as carcinogenic, mutagenic, and teratogenic in animals. Human toxicological data is limited, but PCBs have been found to be able to enter the human body by ingestion, inhalation, and dermal contact. PCBs bio-accumulate in lipids and fatty tissues, and the U.S. EPA has documented that chronic exposure to PCBs in humans can cause skin lesions (chloracne), liver dysfunction and possible permanent liver damage, and possibly cancer. Other symptoms of systemic PCB poisoning include nausea, vomiting, weight loss, jaundice, headaches, edema, and abdominal pain.

With regard to the ingestion of contaminated soils, the U.S. EPA used the existing Carcinogen Assessment Group (CAG) for PCBs and calculated that if the daily intake of PCBs would be limited to 2.3 ng/kg-bw/day (nanograms per kilogram of body weight per day) then the lifetime cancer risk would be limited to approximately 1 in 100,000 (10^{-5}). This intake level corresponded to an acceptable soil concentration of 0.5 to 5.0 ppm. As part of this study, the U.S. EPA reviewed CAG levels for PCBs which were recently revised to 1.3 ng/kg-bw/day for a 1 in 100,000 (10^{-5}) lifetime cancer risk. The risk level corresponds to an acceptable soil concentration of .03 to 3.0 ppm.

The majority of the VOCs found at the site are not considered to be acutely toxic, teratogenic, or mutagenic. However, toxicity studies suggest that liver and kidney damage, marked tachycardia, central nervous system depression, cardiovascular changes, renal toxicity, hepatoxicity, and endema of the lungs may result from acute and chronic exposure to the specific VOCs identified. Vinyl chloride and trichloroethylene are considered to be human carcinogens, while tetrachloroethylene; 1,1,1-trichloroethane; and chloroform are identified as possible human carcinogens based on toxicity studies with laboratory animals.

On the basis of their occurrence and concentration at the site and their toxicologic effects, eight contaminants were selected as being representative of the constituents detected in various environmental media at the site. They were as follows; chloroform, 1,1-dichloroethane, 1,1-dichloroethylene, PCB's, tetrachloroethylene, 1,1,1-trichloroethane, trichloroethylene and vinyl chloride. The sum of the cancer risk from these chemicals is 1.5 X 10^{-3}. This exceeds the risk range of 1 X 10^{-4} to 1 X 10^{-7} which the U.S. EPA has decided as the acceptable range.

VII. DOCUMENTATION OF SIGNIFICANT CHANGES

There are no significant changes from the preferred alternative described in the Proposed Plan (Attachment IV).

VIII. DESCRIPTION OF ALTERNATIVES

In response to the health threat posed by the site, an FS was initiated to evaluate the contamination that was found on the LEU property, in the sanitary and storm sewers at the site, and in the sediment of the unnamed creek at the discharge point of a site storm sewer. A prior study (1986 PFS) examined the contamination in the residential area of the site and along St. Vincent Avenue north and south of the property.

Specifically, the objectives of this alternatives evaluation were: 1) to identify remedial alternatives that would reduce or eliminate the threat to human health and the environment which is present as a result of the PCB-contaminated soil and sediment at the LEU property and in the sewer system at the site, 2) to identify and evaluate alternatives that would reduce or eliminate the threat to human health and the environment that exists as a result of PCB and VOC contamination of the area ground water, and 3) to identify alternatives for cleaning and decontaminating the structures remaining on the LEU property.

To this end, remedial alternatives were examined in detail. The process involved screening according to three basic steps: 1) identification and screening of technologies on the basis of effectiveness, technical feasibility, level of development, and applicability to the specific waste type; 2) development of alternatives by combining technologies that pass screening; and 3) evaluation and comparison of the alternatives on the following basis: protection of human health and the environment; compliance with appropriate or relevant and applicable regulations; long-term effectiveness and performance; reduction of toxicity, mobility or volume; short-term effectiveness; implementability; cost; support Agency acceptance; community acceptance.

Description of Alternatives for Soil and Sediment Remediation:

Technology Screening and Evaluation

Approximately 30 different types of technologies were evaluated for use on the contaminated material. Technology screening was conducted on the basis of effectiveness, feasibility, level of development, and applicability to the waste type.

Some technologies were eliminated from further evaluation because they represented innovative or emerging technologies that have not been sufficiently proven. However, innovative incineration processes were not rejected during this screening since the technology as a whole is conventional. Many of the innovative processes which were eliminated required the use of a time-consuming and expensive solvent extraction process prior to treatment. This type of process was not considered to be technically feasible for the large volumes of material at the LEU property.

Biological metabolism and dechlorination methods were evaluated. However, both the effectiveness and the time required to achieve desirable results are unknown for these experimental in-situ methods. Therefore, these types of technologies were rejected for application at the LEU site.

The processes that remained after screening included: 1) no action, 2) capping (two different types), 3) excavation, 4) thermal destruction (four different types, both on and off-site), and 5) landfilling (on or off-site). (A description of all technologies which were screened and an explanation regarding the decision to reject or retain the specific process is contained in Section 3 of the FS Report.)

Alternatives Screening

After the technology screening process was completed, five alternatives were examined in detail. With the exception of the no action alternative, all the alternatives would involve restoration of the sewer system. This restoration would consist of: 1) removal of the 8-inch sanitary and storm sewers on the LEU property, 2) high pressure flushing and mechanical cleaning of approximately 5,200 feet of sewers in the area, 3) collection and disposal of water and sediment from the sewer flushing activities, 4) excavation of soil or sediment from approximately 500 feet of the unnamed creek beginning at the point of sewer discharge; 5) back filling of the stream channel to its original elevation with clean fill, and 6) disposal of the excavated material along with the contaminated soil on the LEU property.

The following are brief descriptions of the six alternatives which were assembled and evaluated in detail following the initial screening:

Alternative 1: No Action

This alternative provides a baseline against which the adequacy of the other actions can be measured. Under this alternative, the site would be left in its existing state and no funds would be expended for monitoring, controlling, or cleaning up the PCB-contaminated soil. As a result, there would be no reduction in the contaminant migration from the site, and the potential contact hazards associated with the contamination would not be minimized or eliminated.

Alternative 2: Off-Site Landfill

This alternative would involve the excavation of the soil and the shipment of that contaminated material to a U.S. EPA-approved PCB landfill. This facility would provide long-term containment of the waste material. Following the removal of the contaminated soil, the site would be returned to its original elevation and grade with clean soil, which would be revegetated or resurfaced as appropriate.

Alternative 3: Off-Site Incineration

In terms of management of the contaminated soils, this alternative closely resembles the off-site landfill alternative. Under this alternative, the contaminated material would be excavated and then replaced with clean fill; but instead of being stored for an unspecified period of time at a landfill, the material would be shipped to a U.S. EPA-approved commercial incineration facility where it would be destroyed. The residual material could then be used as cover for a sanitary landfill, or as fill for a nearby construction project.

Alternative 4: On-Site Incineration

This alternative also involves the excavation of contaminated material from the site and the replacement with clean fill. However, unlike the previous alternatives, the materials that would be removed during the excavation would not be transported off the site over great distances to a disposal or destruction facility. Instead, the materials would be thermally treated on the LEU property with a mobile incinerator which would be set up at that location. Provided that analysis proves that it is uncontaminated, the residual material could be used as cover material at a sanitary landfill or as fill in roadway and construction projects.

Alternative 5: On-Site Landfill

This alternative would involve the construction of a TSCA compliant chemical waste landfill for the disposal of the PCB-contaminated soil and sediment on the LEU property. The facility would be built above-grade to maintain a separation between the wastes and the shallow ground water. This action would isolate the contaminants from direct human and environmental contact, but the volume and toxicity of the contaminated material will not be reduced. Long-term operation, maintenance, and monitoring of the facility would be required to ensure the integrity of this alternative, and restrictions would have to be placed on the property deed to prevent damage to the containment cell.

Alternative 6: Multilayer Cap

This alternative would involve the construction of a Resource Conservation and Recovery Act (RCRA) equivalent cap over the LEU source area to provide containment of the contaminated soil and to minimize the migration of the contaminants. Like the previous alternative, long term operation, maintenance, and monitoring would be required. In addition, deed restrictions would also be necessary.

Description of Alternatives for Ground Water Remediation:

Technology Screening and Evaluation

Approximately 65 different technologies and/or processes were evaluated as potential remedial candidates for the contaminated ground water at the site. While a number of innovative and emerging technologies were examined during the process, site conditions including the presence of both PCBs and VOCs, the low permeability of the soil, and the extreme range of concentrations of the contaminants made application of most of these treatment methods impractical. In addition, two proven treatment technologies (air stripping and carbon adsorbtion) are capable of completely and permanently removing VOCs from the water at a relatively low cost. Since the effectiveness and costs of many of the innovative and emerging technologies are unproven and uncertain, these technologies were eliminated from further screening during the FS. (A complete description of the technologies screened and an explanation of the decisions regarding their retention or rejection is contained in Section 7 of the FS Report.)

The technologies and processes that remained after screening include: 1) capping, 2) vertical barriers, 3) gradient control, 4) subsurface drains, 5) physical treatment on-site, 6) treatment at a RCRA approved facility, 7) RCRA injection well, 8) recharge trench, and 9) discharge to a publicly owned waste water treatment works (POTW).

Alternatives Screening

Four alternatives were assembled and subjected to detailed analysis after the technology screening process was completed. The following are brief descriptions of the four alternatives which were evaluated in depth:

Alternative 1: No Action

This alternative provides a baseline against which the adequacy of the other actions can be measured. Under this alternative, the site would be left in its existing state and no funds would be expended for controlling or cleaning up the PCB and VOC contaminated ground water. However, money would be spent for annual monitoring of the contaminant plume. As a result, there would be no reduction in the contaminant migration from the site, and the potential contact hazards associated with the contamination would not be minimized or eliminated.

Alternative 2: Containment

This alternative would include construction of a RCRA multilayer cap, installation of a slurry wall, construction of a subsurface drain inside the slurry wall to collect ground water that might build up due to seepage through the cap and walls, and ground water monitoring. Portions of the construction for this alternative would be implemented off the LEU property, and could result in a need to relocate a few existing property owners currently located within the cap area. Long-term operation, maintenance, and monitoring would be required to ensure the integrity of this alternative, and restrictions would have to be placed on the property deeds to prevent damage to the cap.

Alternative 3: Collection and On-Site Treatment

This alternative would consist of subsurface drains including a sump and pump for ground water collection and treatment. Approximately 2,000 gallons per day would be captured and would need treatment. The actual treatment would be detailed during the design process, but would include phase separation, filtration, and air stripping. The system would be completely automated and housed in a pre-fabricated building on the LEU property. The treated water would be discharged to the local waste water treatment plant via sanitary sewers. Routine operation, maintenance, and monitoring would be necessary for approximately 12 years.

Alternative 4: Collection and Off-Site Treatment

This alternative would essentially be identical to the previous one, with the one exception being that the contaminated ground water collected would be processed at an off-site chemical waste water treatment facility. Long-term operation and maintenance of the collection system and ground water monitoring would be required for approximately 12 years.

Description of Alternatives for Remediation of Structures:

Technology Screening and Evaluation

Several methods for decontaminating the PCB-contaminated structures at the LEU site were originally evaluated during the 1986 PFS. The methods which were determined to be the most suitable for decontamination (based on an evaluation of effectiveness, implementability, and cost) are as follows: 1) dusting, vacuuming, and wiping; 2) dismantling, removal, and replacement; 3) high pressure water or water-detergent washing; 4) solvent washing; 5) steam cleaning; and 6) application of strippable or fixative coatings.

Methods used to decontaminate structures and equipment are generally proprietary techniques and are not well documented. Therefore, testing and perhaps a pilot-scale study of the technology would be required before any procedure could be implemented on a full-scale.

A limitation of all technologies is that surface and subsurface sampling techniques are not standardized. Therefore, initial and final contamination levels may not accurately reflect the effectiveness (or lack thereof) of the decontamination methods used. Consequently, the residual long-term risks would be very questionable. Such uncertainty about risks remaining would reduce the salability of the property.

Alternatives Screening

A total of 148,000 square feet of surface area was estimated for exterior cleaning of all buildings, while 233,000 square feet of surface area (including 18,000 square feet of interior offices) was estimated for the interiors of the structures. Several combinations of decontamination methods were evaluated. These combinations all utilized similar methods. However, the potential degree of decontamination achieved varied, depending upon the proportion of the surface area receiving a particular treatment.

After detailed analysis and cost comparison of the cleanup alternatives, after factoring in the inability to verify the achievement of decontamination and the resultant protection associated with the cleaning, and after concerns over continuing long-term liability were raised, demolition and disposal of the structures was selected as the only viable alternative that offers the protectiveness desired. (See Appendix E and Sction 2 of the FS for further details of the evaluation.)

IX. SUMMARY OF COMPARATIVE ANALYSIS OF ALTERNATIVES

Each of the alternatives were evaluated according to current U.S. EPA guidance and Section 121 of SARA which states that the selected remedy is to be protective of human health and the environment, cost-effective, and use permanent solutions and alternative treatment technologies or resource recovery technologies to the maximum extent practicable. Also, all alternatives have been evaluated based on the following criteria specified in "Additional Interim Guidance on Superfund Selection of Remedy" dated July 24, 1987:

1. Overall protection of human health and the environment addresses whether of not a remedy provides adequate protection, and describes how risks are eliminated, reduced or controlled through treatment, engineering controls, or institutional controls.

2. Compliance with ARARs addresses whether or not a remedy will meet all of the applicable or relevant and appropriate (ARARs) requirements of other environmental statutes and/or provide grounds for invoking a waiver.

3. Long-term effectiveness and permanance refers to the ability of a remedy to maintain reliable protection of human health and the environment over time once cleanup goals have been met.

4. Reduction of toxicity, mobility, or volume is the anticipated performance of the treatment technologies a remedy may employ.

5. Short-term effectiveness involves the period of time needed to achieve protection and any adverse impact on human health and the environment that may be posed during the construction and implementation period until cleanup goals are achieved.

6. Implementability is the technical and administrative feasibility of a remedy, including the availability of goods and services needed to implement the chosen solution.

7. Cost includes capital and operation and maintenance costs.

8. Support agency acceptance indicates whether, based on its review, of the RI/FS and Proposed Plan, the support agency (IEPA) concurs, opposes, or has no comment on the preferred alternative.

9. Community acceptance indicates the public support of a given remedy.

The analysis that follows was performed using the above factors as they apply to each of the developed alternatives.

SOILS AND SEDIMENTS

Overall Protection of Human Health and the Environment

The No Action alternative does not afford adequate protection of human health and the environment since unacceptable risks will be allowed to remain. It therefore is not eligible for further consideration.

All the remaining alternatives afford adequate protection, although they do o through different means of remediation. Alternative 3 (Off-site Incineration) and Alternative 4 (On-Site Incineration) eliminate the risk by destroying the contaminants. Alternative 2 (Off-site Landfill), Alternative 5 (On-site Landfill), and Alternative 6 (Multi-layer Cap) also afford protection through engineering controls.

Compliance with Applicable or Relevant and Appropriate Requirements

All the alternatives examined in detail would attain all applicable or relevant and appropriate requirements of Federal and State Laws. The TSCA requirements entered most prominently into the analysis. TSCA regulations require that PCB contaminated soil in concentrations greater than 50 ppm must be taken to, or disposed of, at a TSCA regulated facility. If PCB wastes are incinerated, a destruction removal efficiency of at least 99.9999 percent must be met. Further information of compliance with applicable or relevant and appropriate requirements is included in Section XI of this report.

Long-Term Effectiveness and Permanence

The most advantageous alternatives for long-term effectiveness and permanence are 3 (Off-site Incineration) and 4 (On-site Incineration). These two alternatives offer the highest degree of effectiveness and permanence by permanently destroying the contaminants in the soil and sediments. The incineration option would provide removal by destruction of contaminants.

Alternative 2 (Off-site Landfill) and 5 (On-site Landfill), while offering a degree of effectiveness by engineering controls, do not destroy the contaminants as would Alternatives 3 and 4. There is also difficulty in assuring the long-term integrity of hazardous waste landfills.

Alternative 6 (Multi-layer Cap) offers the least long-term effectiveness of all the alternatives considered. Since there would be no underlying liner and collection system as in 2 and 5, long-term monitoring and maintenance would be required to assure the permanence of this remedy.

Reduction of Toxicity, Mobility or Volume

Alternatives 3 (Off-site Incineration) and 4 (On-site Incineration) offer the advantage of permanently destroying the contaminants in the soil, therefore satisfying this criteria completely.

Alternatives 2 (Off-site Landfill) 5 (On-site Landfill) and 6 (Multi-layer Cap) offer no reduction of toxicity, or volume, however, the mobility of the contaminants is reduced.

Short-Term Effectiveness

Alternative 6 (Multi-layer Cap) would be the most effective in the short-term. Installation could be completed within a year and would quickly minimize the pathways of exposure and migration of contaminants. The least adverse environmental impacts would occur during the implementation of this alternative.

All the remaining alternatives are roughly comparable in terms of effectiveness. Alternatives 3 (On-site Incineration) and 5 (On-site Landfill) are estimated at 1-2 years for construction and on-site disposal or incineration of contaminated soil and sediments. There are adverse effects to the environment from volatilation caused by excavation and potential material handling incidents. Alternative 2 (Off-site Landfill) is effective in the short-term in that it can achieve the respective response objective by transporting material off-site within 1 to 2 years, resulting in relatively rapid reduction of site risks. The risks associated with this alternative are potential adverse impacts due to excavation, material handling, and off-site transportation. Alternative 4 (Off-site Incineration) has similar advantages as Alternative 2, but the additional disadvantage of long-term storage on-site until incineration can be completed. This storage can potentially be required for as long as is 15 years.

Implementability

Alternatives 5 (On-site Landfill) and 6 (Multi-layer Cap) are easily implemented and constructed using standard materials, equipment and methods.

Alternative 4 (On-site Incineration) could not be fully implemented until a trial burn was conducted and certification of operation was granted. It is possible that certification may delay the actual operational date of the incinerator.

Alternative 2 (Off-site Landfill) will be more difficult to implement due to the shortage of space at approved hazardous waste facilities.

Alternative 3 (Off-site Incineration) would be very difficult to implement. The materials must be packaged in small drums for storage and subsequent transportation. The facilities which may be used have commitments to clients which would result in only a small fraction of material being incinerated monthly.

Cost

The most cost-effective Alternatives are 5 (On-site Landfill) with a capital cost of $3,486,006 and an annual cost of $12,000 and Alternative 6 (Multi-layer Cap) with a capital cost of $3,544,700 and an annual cost of $12,000.

Alternative 2 (Off-site Landfill) and 4 (On-site Incineration) are an order of magnitude more expensive than the previous alternatives. Alternative 2 has a capital cost of $25,427,662 and no annual costs. Alternative 4 has a capital cost or $28,625,998 and no annual costs.

The least cost-effective is Alternative 3 (Off-site Iincineration) with a capital cost of $151,350,144 and no annual cost.

Support Agency Acceptance

All the alternatives will meet the criteria set forth by the State of Illinois for protection of the public health. However, the State has expressed their preference for on-site incineration and has stated that any landfill alternative would be their least preferred method for a selected remedy.

Community Acceptance

The citizens as well as local and state officials have expressed their support for the selected alternatives. The citizens have expressed their desire that the on-site landfill or multi-layer cap not be considered. The citizens prefer that the site be restored to usable commercial property capable of supplying employment to the local residents. They also expressed interest in modifying the existing cleanup contract to allow the selected alternative to be completed in a more timely manner.

GROUNDWATER

Overall Protection of Human Health and the Environment

Alternative 1 (No-Action) would not reduce or eliminate human exposure and would be unprotective of associated risks by ingestion. Therefore, this alternative was eliminated from further consideration.

All remaining alternatives (Alternative 2, Containment; Alternative 3, Collection and On-site Treatment; Alternative 4, Collection and Off-site Treatment) are designed to eliminate human exposure. Therefore, all remaining alternatives would be protective of human health and the environment even though the degree of protection afforded is not necessarily equal for each alternative.

Compliance with Applicable or Relevant and Appropriate Requirements

Alternative 2 (Containment), 3 (Collection and On-site Treatment) and 4 (Collection and Off-site Treatment) would all be in full compliance with all applicable or relevant and appropriate requirements. Section XI of this document further describes the attainment of these requirements.

Long-term Effectiveness and Permanence

Alternative 3 (Collection and On-site Treatment) and 4 (Collection and Off-site Treatment) would meet this criterion by effectively eliminating the related risk by removing contaminated groundwater from the aquifer of concern. Both would require operation, maintenance and monitoring for approximately 12 years.

Alternative 2 (Containment) would provide a reduction in the future risk by minimizing migration of the contaminants. Long-term operation, maintenance, monitoring, and institutional controls would also be required to insure the integrity of this alternative.

Reduction of Toxicity, Mobility or Volume

Alternatives 3 (Collection and On-site Treatment) and 4 (Collection and Off-site Treatment) would reduce the toxicity, mobility and volume of the contaminants through capture and treatment of contaminated groundwater thereby removing the source of the risk.

Alternative 2 (Containment) would not affect the toxicity or volume of contaminants present at the site, however, the mobility would be reduced through engineering controls, such as slurry wall barriers and capping, designed to reduce ground water migration.

Short-term Effectiveness

All the alternatives have approximately equal short-term effectiveness. Alternative 2 (Containment) is effective in the short-term in that it can achieve its response objective in 1-2 years. There would be adverse affects from the volatilation of contaminants during construction. Alternatives 3 (Collection and On-site Treatment) and 4 (Collection and Off-site Treatment) also would take 1-2 years to construct and implement. While no significant adverse effects exist for Alternative 3, adverse effects during material handling and transport may be present with Alternative 4.

Implementability

In terms of implementability, Alternative 3 (Collection and On-site Treatment) and 4 (Collection and Off-site Treatment) could be easily constructed using standard material, equipment and methods. Any problems encountered should be insignificant and easily minimized by careful planning during the design and implementation. The only implementation difficulty associated the Alternative 4 would be the inability to locate an off-site treatment facility in compliance with the U.S. EPA's off-site policy.

Implementation of Alternative 2 (Containment) may be very difficult due to the need for access agreements from, or relocation of, current property owners, as well as property use restrictions.

Cost

The most cost-effective Alternative is 3 (Collection and On-site Treatment) with a capital cost of $2,152,106 and annual costs of $64,000. The next most cost-effective Alternative is 4 (Collection and Off-site Treatment) with a capital cost of $2,139,244 and annual costs of $212,000. The least cost-effective Alternative is 2 (Containment) with a capital cost of $6,802,878 and annual costs of $54,550.

Support Agency Acceptance

While the State has supported all the alternatives selected for evaluation, they have stated a preference for collection and on-site treatment of contaminated ground water.

Community Acceptance

The citizens as well at State and local officials have expressed their support for all the selected Alternative. The citizens' primary concerns were that the site be restored to usable commercial property capable of supporting employment to the local residents and that the existing cleanup contract be modified to permit completion in a more timely manner.

X. SELECTED REMEDY

The Agency selected the alternative which was determined to most effectively remedy the contamination problem remaining at this site, consists of excavation and on-site incineration of affected soil and sediment, flushing and cleaning of affected sewer lines, demolition and disposal of structures on the LEU property, and collection and on-site treatment of affected ground water. The remedy will result in restoration of the contaminated aquifer to acceptable and safe levels of contaminants. Soils will be excavated consistent with the cleanup levels selected in the 1986 ROD. Specifically the levels are 5 ppm in surface soils and 10 ppm at depths greater than one foot when clean fill material is used to return the area to its original grade. (A discussion of the soil clean up levels is contained in the 1986 ROD.) The cleanup level for the building is the removal of all building material.

These Alternatives are consistent with and complement the prior alternatives selected in the August 29, 1986 ROD. Jointly, these alternatives comprise a complete cleanup of this site.

Section 104(c)(3) of CERCLA as amended sets forth State financial responsibilities in remedial actions. The State of Illinois' financial responsibilities in the proposed remedial action would include payment, or assurance thereof, of 10 percent of the costs of the remedial action and 100 percent of the costs of any operation and maintenance which is not considered to be the responsibility of the U.S. EPA according to Section 104(c)(6) of CERCLA as amended.

XI. STATUTORY DETERMINATIONS

Protection of Human Health and the Environment

The selected remedy provides adequate protection of human health and the environment in eliminating the direct contact threat from the contaminated soil and sediment through incineration which will permanently destroy the PCBs, and demolition and disposal of the contaminated buildings. The threat to human health and the environment posed by the contaminated ground water will be eliminated through collection and treatment of the ground water, restoring the ground water to drinkable quality. Implementation of the selected remedy will not pose any unacceptable short-term risks.

Attainment of Applicable or Relevant and Appropriate Requirements

This remedy will attain all applicable or relevant and appropriate requirements of other Federal and State environmental laws. They are:

Toxic Substances Control Act. PCB disposal regulations under 40 CFR 760.60 require that PCB contaminated soil in concentrations greater than 50 ppm be taken to a TSCA regulated facility. Incineration of PCB waste must be able to meet a destruction removal efficiency of at least 99.999 percent. These requirement are applicable and will be met. In addition, residual material from the incinerator would be required to contain less than 2 ppm PCBs.

Resource Conservation and Recovery Act. Ground water will be monitored for three years following attainment of cleanup levels consistent with corrective action monitoring requirements under 40 CFR 264.100.

Safe Drinking Water Act. Contaminated ground water will be collected to achieve Maximum Contaminant Levels for VOCs; PCB's will be removed to the 1 ppb level.

Clean Water Act. Ground water that is collected will be discharged to the local waste water treatment plant following treatment and will meet pretreatment standards established pursuant to 40 CFR 403.5.

Clean Air Act. Emission control requirements may be applicable to emissions from the incinerator depending on the magnitude of the emissions. Parameters of concern are sulphuric oxides (SO_x), nitric oxides (NO_x) gases, and particulates. Costs for air pollution control equipment have been included in the total cost for the selected remedy. Asbestos in the LEU buildings will be disposed consistent with the NESHAPS for asbestos (40CFR 61.147).

In addition to the ARARs noted above, any off-site disposal of the debris resulting from demolition of the LEU structures will be carried out in accordance with "Revised Procedures for Implementing Off-site Response Actions," November 13, 1987.

Cost-Effectiveness

The selected remedy provides the greatest overall effectiveness of all of the alternatives evaluated; affords the highest degrees of long-term effectiveness and permanence; reduces the toxicity, mobility or volume; and provides reasonable effectiveness in the short-term. Present worth costs of the selected remedy are estimated at $28,625,998 for the excavation and on-site incineration of the soil and sediment, $2,588,182 for ground water collection and on-site treatment, and $3,281,000 for demolition and disposal of the structures. These costs are and within an order of magnitude of what it would cost to simply dispose of, or cap, the material on-site. In this context, U.S. EPA and the State of Illinois believe that the costs of on-site incineration are proportionate to the effectiveness achieved and represent a reasonable value for the money. (A summary of the costs for the various alternatives is contained in Attachment II.)

It is worth noting that while cost estimates were prepared using standard guidance, it is likely that actual costs for on-site incineration may be significantly lower than estimates based on experience with the previous remedial action undertaken at this site under the August 1986 ROD. The cost of that operable unit, which involved removal and on-site thermal destruction of approximately 24,000 cy of PCB-contaminated residential soils, were estimated at $27 million but the construction contract was awarded to the low bidder for $12 million. Figuring in IEPA management costs and resident inspection service, that part of the project should cost approximately $15 million, representing a 45 percent cost savings. This low bid is due to the current competitive atmosphere in the thermal destruction business in which many companies are willing to cut profits to a minimum in order to gain experience and to prove that their equipment can perform. In addition, the level of competition has been further increased at this site by the use of performance specifications and the two-step procurement procedures, which substantially increases the size of the pool of potential bidders for the work. It is therefore possible that the on-site incineration will prove even more cost-effective than currently estimated when the project is actually bid.

The selected ground water alternative, collection and on-site treatment, is the least costly of all ground water alternatives that would afford adequate protection. In addition, this alternative offers significantly greater overall effectiveness than the more costly containment option since it will ultimately restore the ground water for use as a source of drinking water.

Demolition and disposal of the structures was less costly than any of the decontamination options evaluated, which ranged from $4.0 - $7.5 million. In addition, a 1986 market evaluation of the structures by the Illinois Department of Commerce and Community Affairs estimated that the structures were only worth approximately $1.1 million, and that building replacement costs were approximately $1.5 million.

U.S. EPA and IEPA believe that each component of this remedial action is cost-effective and that the remedy as a whole represents a reasonable value for the money.

Utilization of permanent Solutions and Alternative Treatment Technologies and Resource Recovery Technologies to the Maximum Extent Practicable

U.S. EPA and State of Illinois believe that after a careful evaluation of the alternatives, and after balancing the outcomes from the various evaluations, the selected remedy is the most appropriate solution at the LaSalle site. This remedy not only meets the goals of both agencies in terms of a final remedial action, but it also provides permanent protection of human health and the environment from the risks currently posed by the contaminated soil, sediment, and ground water. This protection is achieved by destroying the contaminants or reducing them to nonhazardous levels. The long-term effectiveness of this remedy is achieved within a reasonable period of time without posing any short-term risks that cannot be managed properly. This remedy can be readily implemented at reasonable cost and is accepted by the State and community. Finally, this remedy represents the practicable extent to which permanent solutions and treatment can be utilized at this site.

Preference for Treatment as a Principal Element

The selected remedy addresses the principal threats posed by the site through the use of treatment technologies, thus satisfying the statutory preference for remedies that employ treatment as a principal element.

Attachment I

CHRONOLOGY OF REGULATORY ACTIONS
LASALLE ELECTRICAL UTILITIES

* September 1975	LEU cited for inadequate PCB storage facilities by U.S. EPA.
* October 1979	Violation of PCB management practices documented by U.S. EPA and OSHA.
* July 1980	U.S. EPA issues Toxic Substances Control Act (TSCA) complaint.
* December 1980	IEPA soil sampling revealed extensive PCB contamination on the LEU property.
* March and May 1981	IEPA soil sampling revealed PCB contamination on property other than LEU's.
* May 1981	IEPA, under authority of Section 34 of the Illinois Environmental Protection Act, sealed all but the leased area of the LEU property.
* June to September 1981	IEPA conducted additional soil sampling in the area.
* May 1982	IEPA filed a State of Illinois complaint.
* August 1982	IEPA amended the State of Illinois complaint and also filed a Federal complaint under TSCA.
* August 1982	U.S. EPA field investigation team installed four monitoring wells at the site.
* December 1982	Based on the information gathered, the site is included on the first publication of the NPL. HRS score equaled 42.06.
* July 1983	A U.S. EPA contractor fenced part of the LEU property as an immediate removal measure at the site.

* July and October 1983	The U.S. EPA conducted additional sampling south of the LEU property. Results indicated heavy contamination on the property immediately to the south.
* June 1984	The U.S. EPA conducted an immediate removal action at the site and capped the section of the property south of the LEU site which was found to be heavily contaminated. This cap diverted drainage to an on-site pond that was also constructed.
* June 1984 to July 1985	IEPA conducted additional soil and ground water sampling in the area. Ground water contamination, including volatile organic contaminants (VOCs) and PCBs, was identified.
* April 1985	The U.S. EPA conducted an immediate removal action at the site. PCB waste material that had been stored on the site was staged, sampled, and packaged for eventual disposal.
* August 1985	Draft FS by IEPA contractor addressed contamination in area soils.
* December 1985	The IEPA conducted an immediate removal at the site. An IEPA contractor removed the previously staged material and transported it to a nearby incineration facility.
* January 1986	Draft RI report prepared by IEPA.
* June to August 1986	Phased Feasibility Study (PFS) regarding soil contamination not on the LEU property is prepared by IEPA contractor.
* August 1986	U.S. EPA Record of Decision regarding residential soil contamination is signed.

* January to July 1987	IEPA contractor prepared design plans and specifications for the cleanup of contaminated residential soils.
* January to December 1987	IEPA contractor conducted investigation of groundwater contamination at the site.
* January 1988	IEPA signs contract and begins preliminary work related to the cleanup of residential soils.

Attachment II

SUMMARY OF COSTS

Alternative	Capital Cost [1]	Annual Cost	Present Value [2]
Soil and Sediment			
No Action	-0-	-0-	-0-
Off-site Landfill	25,427,662	-0-	25,427,662
Off-site Incineration	151,350,144	-0-	151,350,144
On-site Incineration	28,625,998	-0-	28,625,998
On-site Landfill	3,486,006	12,000	3,599,132
RCRA-type Cap	3,544,700	12,000	3,657,823
Ground Water			
No Action	-0-	56,000	527,907
Containment	6,802,878	54,550	7,317,116
Collection/On-site Treatment[3]	2,152,106	64,000	2,588,182
Collection/Off-site Treatment[3]	2,139,244	212,000	3,583,747
Structures			
No Action	-0-	-0-	-0-
Decontamination Level 1	4,037,000	-0-	4,037,000
Decontamination Level 4	7,511,000	-0-	7,511,000
Demolition/Off-site Disposal	3,281,000	-0-	3,281,000
Recommended Alternatives[4]			
On-site Incineration	28,625,998	-0-	28,625,998
Collection/On-site Treatment	2,152,106	64,000	2,588,182
Demolition/Off-site Disposal	3,281,000	-0-	3,281,000
Totals	34,059,104	64,000	34,495,180

1 Capital costs include a 35 percent multiplier to allow for both bid and construction contingencies.

2 Present value is computed using a 100 percent discount rate and a 30 year time period.

3 Present value for this alternative was computed based on a 12 year time period.

4 Implementation of the recommended alternatives will also involve design and constructio oversight expeditures which have been projected at $500,000 and $2.6 million respective

ATTACHMENT III

RESPONSIVENESS SUMMARY

ATTACHMENT IV

PROPOSED PLAN LASALLE ELECTRICAL UTILITIES

PROPOSED PLAN
LASALLE ELECTRICAL UTILITIES
LaSalle, Illinois
January 1988

Section 117(a) of CERCLA, as amended by SARA, requires the Agency to issue a "Proposed Plan" and make such plan available to the public for comment. This document satisfies that requirement in that it: 1) describes the alternatives from the detailed analysis in the Feasibility Study (FS), 2) identifies the preferred alternatives; and 3) provides a brief analysis of the preferred alternatives for the LaSalle Electrical Utilities (LEU) site.

The Proposed Plan for the LEU site is made available with the FS for public review and comment. In addition to the Proposed Plan and FS, other documents, including the remedial investigation (RI) reports, which were used as part of the development process are available for public review also. A complete listing of all documents relevant to this project is contained in the Administrative Record Index which is currently being developed, and will be available by February 17, 1988.

The Proposed Plan for the LEU site is meant to provide all interested parties with a summary of the alternatives evaluated, and the rationale for the Agency's selection of the preferred alternative. The public should review the FS and other pertinent documents as referenced in the Summary of Remedial Alternative Selection, if a more detailed and specific description of the project and the alternatives evaluated is desired.

All documents which have been developed and released to the public are available for public inspection at the following locations:

City Clerk's Office
City of LaSalle
745 Second Street
LaSalle, IL 61301
(815) 223-0077

Bob Rosen
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, IL 62706
(217) 782-9878

Daniel Caplice
United States Environmental Protection Agency
230 S. Dearborn Street (5HR-11)
Chicago, IL 60604
(312) 886-0397

Written and verbal comments will be accepted from January 18 to February 19, 1988, and addressed in a Responsiveness Summary which will be attached to the formal Record of Decision. All written comments should be addressed to:

Bob Rosen
Community Relations Coordinator
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, IL 62706
(217) 782-9878

Pursuant Section 117 of CERCLA as amended, a public meeting will be held on Wednesday, February 17, 1988 at 7:00 p.m. at the LaSalle, Illinois Howard Johnson located at the intersection of I-80 and U.S. 51. Oral and written comments can be submitted at that time. A transcript of the meeting will be made, and will also be available for public review.

ATTACHMENT V

ADMINISTRATIVE RECORD INDEX